| 1 | DAVID T. BROWN, ESQ. Nevada Bar No. 006914 | | | |
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| 2 | BROWN BROWN & PREMSRIRUT 520 South Fourth Street | | | |
| 3 | Las Vegas, Nevada 89101 Phone: (702) 384-5563 | | | |
| 4 | Fax: (702) 385-1023 Attorney for Defendant | | | |
| 5 | | | | |
| 6 | UNITED STATES DISTRICT COURT | | | |
| 7 | DISTRICT OF NEVADA | | | |
| 8 | UNITED STATES OF AMERICA, | | | |
| 9 | Plaintiff,) 2:20-CR-00298-APG-EJY | | | |
| 10 | VS. 2.20 CR 00290 AT G EST | | | |
| 11 | LEILANI BLANCO, | | | |
| 12 | Defendants. | | | |
| 13 | | | | |
| 14 | STIPULATION TO CONTINUE SENTENCING | | | |
| 15 | (First Request) IT IS HEDERY STIPHI A TED AND A CREED, by and between Christenber Chieve | | | |
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| 21 | This Stipulation is entered into for the following reasons: | | | |
| 22 | 1. Ms. Blanco is currently cooperating with the Governments of the United States | | | |
| 23 | and Canada. | | | |
| 24 | 2. Ms. Blanco is scheduled to testify as a witness in a Canadian prosecution in June | | | |
| 25 | and will provide further cooperation to the Government in the United States. | | | |
| 26 | 3. The full extent of Ms. Blanco's cooperation will not be known until after | | | |
| 27 | trial or resolution of the cases in Canada and the United States. | | | |
| 28 | 4. The undersigned has spoken to Ms. Blanco and she has no objection to this | | | |
| _0 | request for a continuance. | | | |
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| 1 | 5. The additional time requeste | d herein is not sought for purposes of delay. |
|----|--|---|
| 2 | DATED this 1 st day of June, 2021. | |
| 3 | | David Brown /s/ |
| 4 | | David Brown /s/ |
| 5 | | DAVID T. BROWN, ESQ. Counsel for Defendant |
| 6 | | Counsel for Defendant |
| 7 | | Kimberly Sokolich /s/ |
| 8 | | VIMBEDI V A SOVOLICH ESO |
| 9 | | KIMBERLY A. SOKOLICH, ESQ. United States Attorney |
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| 2 3 4 5 6 | DAVID T. BROWN, ESQ. Nevada Bar No. 006914 BROWN, BROWN & PREMSRIRUT 520 South Fourth Street Las Vegas, Nevada 89101 Phone: (702) 384-5563 Fax: (702) 385-1023 Attorney for Defendant | | | | |
|-----------------------|---|---|--|--|--|
| 7 | UNITED STATES DISTRICT COURT | | | | |
| 8 | DISTRICT OF NEVADA | | | | |
| 9 | UNITED STATES OF AMERICA, | | | | |
| 11 | Plaintiff, |)) 2:20-CR-00298-APG-EJY | | | |
| 12 | vs. |)) | | | |
| 13 | LEILANI BLANCO, | FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER | | | |
| 14 | Defendants. | | | | |
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| 17 | FINDINGS OF FACT Based on the pending Stipulation of counsel, and good cause appearing therefore, the | | | | |
| 18 | Court finds that: | ounsel, and good cause appearing incretore, the | | | |
| 19 | | rating with the Governments of the United States | | | |
| 20 | | | | | |
| 21 | | tify as a witness in a Canadian prosecution in June | | | |
| 22 | and will provide further cooperation to the Go | • | | | |
| 23 | | s cooperation will not be known until after | | | |
| 24 | trial or resolution of the cases in Canada and | the United States. | | | |
| 25 | 4. The undersigned has spoken to | Ms. Blanco and she has no objection to this | | | |
| 26 | request for a continuance. | | | | |
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5. The additional time requested herein is not sought for purposes of delay. 1 2 **CONCLUSION OF LAW** 3 The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence. 8 IT IS THEREFORE ORDERED that the Stipulation be filed UNDER SEAL. 9 IT IS FURTHER ORDERED that the Tuesday, June 29, 2021, sentencing be October 6 , 2021, at the hour of 9:00 a .m., in vacated and continued to Courtroom # 6C. 11 12 **DATED** this 2nd day of June, 2021. 13 United States District Judge 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

| 1 | | <u>CERTIFICATE OF SERVICE</u> |
|----|---------|--|
| 2 | T | he undersigned certifies that on the 1st day of June 2021, the STIPULATION TO |
| 3 | CONTIN | NUE SENTENCING was electronically served upon all attorneys of record in this |
| 4 | matter. | |
| 5 | D | avid Brown /s/ |
| 6 | BY: | |
| 7 | N | avid T. Brown evada Bar No. 6914 20 S. Fourth Street |
| 8 | La | as Vegas, Nevada 89101 |
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